

MEMO ENDORSED

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March 11, 2020

Via ECF and Email

Hon. Katherine Polk Failla
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Re: **ABKCO Music & Records, Inc., et al v. Coda Publishing, Ltd., et al**
No.1:19-cv-11892

Dear Judge Failla:

This office represents ABKCO Music & Records, Inc., ABKCO Music, Inc., UMG Recordings, Inc., Universal - Songs of Polygram International, Inc., Polygram Publishing, Inc., Songs of Universal, Inc., and Universal Music Corp. (collectively "Plaintiffs") in the above referenced action.

I write to request that the initial pretrial conference scheduled for April 1, 2020 at 11:30 A.M. be adjourned. I request the adjournment because my office represents the defendants in another case in this District, which is currently pending before Judge Koeltl (*Beata Music, LLC v. Danelli*, 18-cv-6354). Unfortunately, due to the discovery deadline and logistical concerns with parties traveling from California and Tennessee, multiple depositions must be conducted that week, including on April 1, 2020.

This is the second request for adjournment for the initial pretrial conference, which was originally scheduled for March 25, 2020. The Court granted the first joint request by a Memo Endorsement on March 2, 2020 (ECF Doc. No. 47). Counsel for the Defendants have consented to the request.

The parties are unavailable April 2-3, 9-10 and 15-17, but are available April 6-8, and 13-14. The parties can also work with the Court to arrange an alternative date.

MICHAEL B. KRAMER & ASSOCIATES

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Michael B. Kramer
Michael B. Kramer

cc: All counsel by ECF

Application GRANTED. The initial pretrial conference previously scheduled for April 1, 2020 is hereby ADJOURNED to **April 7, 2020, at 10:30 a.m.** in Courtroom 618 of the Thurgood Marshall Courthouse. The parties proposed case management plan and joint status letter should be submitted to the Court on or before **April 2, 2020.**

Dated: March 11, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE